

EXHIBIT H

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

THE STATE OF LOUISIANA, By and
through its Attorney General, JEFF
LANDRY, et al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, et
al.,

Defendants,

and

HEALTHY GULF, et al.,

Intervenor-Defendants.

Civ. No.: 2:21-cv-00778-TAD-KK

Judge: Terry A. Doughty

Mag. Judge: Kathleen Kay

DECLARATION OF CATHERINE COLLENTINE

1. My name is Catherine Collentine. I am an Associate Director of the Sierra Club's Beyond Dirty Fuels Campaign and have been in this position for three years. In this capacity, I oversee our oil and tar sands work across the country, assist our Director to lead a campaign on fossil fuel infrastructure issues, and manage staff on our team. Before holding this position, I worked for the Sierra Club for four years as a Senior Campaign Representative leading our work on tar sands and oil pipeline issues and on a state-based campaign to regulate oil and gas development in Colorado.

2. Sierra Club is the nation's oldest grassroots organization dedicated to the protection and preservation of the environment. Sierra Club has approximately 3.8 million members and supporters nationwide, including chapters and members in each of the 50 states.

3. Sierra Club is dedicated to exploring, enjoying, and protecting the wild places of the Earth; practicing and promoting the responsible use of the Earth's ecosystems and resources; educating and enlisting humanity to protect and restore the quality of the natural and human environment; and using all lawful means to carry out these objectives. In addition to helping people from all backgrounds explore nature and our outdoor heritage, the Sierra Club works to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and legal action.

4. Sierra Club's membership includes persons who live near, recreate in, and otherwise use and enjoy federal public lands and waters that are subject to oil and gas leasing, permitting and drilling, including hydraulic fracturing and the infrastructure associated with such oil and gas operations. Members of the Sierra Club use these public lands, and the rivers, streams, and wetlands within them, for outdoor recreation and scientific study of various kinds, including nature study, birdwatching, observing wildlife (including protected species), photography, fishing, canoeing, camping, solitude, and a variety of other activities. Oil and gas leasing and the subsequent operations involve a variety of adverse environmental impacts that can interfere with our members' use and enjoyment of these public lands and waters, such as air emissions, water discharges, disruption of wildlife, noise, vibration, traffic, and diminishment of natural views.

5. The Sierra Club is dedicated to averting the worst impacts of the climate crisis through slowing or stopping the expansion of fossil fuel production and infrastructure and protecting the environment and communities from the environmental impacts of these projects. Part of this program involves opposing oil and gas development of the federal public

lands as well as offshore areas that have adverse impacts on human health and the environment. We have numerous staff who work on these issues with volunteer Sierra Club members in organizing rallies, disseminating information, attending public meetings and commenting on oil and gas leasing, drilling and other harmful projects in efforts to protect the community, educate the public on the impacts of these projects, and encourage federal, state, and local officials to take the most protective measures in regard to such projects.

6. Sierra Club members work to protect our public lands from all forms of commercial exploitation and to protect rare wildlife, habitat, and biodiversity. Oil and gas development on federal public lands and waters threatens Sierra Club members' use and enjoyment of these areas. In addition, Sierra Club has members who reside in coastal communities that are threatened by drilling and fracking activities, including areas subject to the leasing pause, and they are exposed to the air and water pollution associated with these activities.

7. The members' concerns encompass the protection of public lands and oceans, wildlife and habitat, including threatened and endangered species, water resources, air, climate, public health, and the health of its members, all of which stand to be adversely affected by projects that are approved under the Interior Department's leasing program. Sierra Club strives to empower its members and coalition partners in their efforts to protect communities, ecosystems, and water quality from the federally-permitted oil and gas operations and promotes the protection of oceans, rivers, streams, wetlands, and threatened and endangered species on a national, state, and local level towards this end.

8. For decades Sierra Club and its members have engaged in activism, submitted public comments, attended public meetings, promoted legislation, filed administrative protests with BLM, and litigated numerous federal oil and gas lease sales, BLM resource management

plans (RMPs) that designate areas for such leasing, and individual permits to drill. Recent examples include such activities on oil and gas operations in the White River National Forest in Colorado, BLM's Colorado River Valley Field Office Resource Management Plan, BLM's opening of 1.2 million acres for oil and gas leasing in Central California under its Resource Management Plan, BLM's oil and gas leasing for approximately 41,000 acres in the San Juan basin in New Mexico, leasing on federal public lands near Chaco Canyon, New Mexico, on federal public lands near the Petrified Forest in Arizona, on federal lands near Bears Ears National Monument in Utah, oil and gas leasing in the Wayne National Forest in Ohio, oil and gas leasing on federal lands in Montana and North Dakota, and challenging BLM's Uncompaghre RMP, to name a few.

9. Further examples of participation by Sierra Club and its members in oil and gas leasing on federal land includes a protest of BLM's May 12, 2016 oil and gas lease sale involving the Tres Rios and Little Snake Field Offices in Colorado (March 14, 2015); a protest of BLM's planned July 20, 2016 oil and gas lease sale in the Carlsbad Field Office of New Mexico (May 20, 2016); comments on the proposed November 2016 oil and gas lease sale in the Grand Junction, Tres Rios, and Royal Gorge Field Offices in Colorado; comments on the EA for the proposed November 2016 oil and gas lease sale in the Rock Springs, Kemmerer, Pinedale, and Rawlins Field Offices in Wyoming (May 19, 2016); comments regarding the BLM's January 2017 oil and gas lease sale in the Farmington Field Office of New Mexico (June 17, 2016 and June 20, 2016); a protest of the planned August 2, 2016 oil and gas lease sale of parcels in the Wind River/Bighorn Basin and High Plains districts in Wyoming (June 2, 2016); comments on the proposed October 2016 oil and gas lease sale in the HiLine district of Montana (June 14, 2016); submitted comments on the proposed November 15, 2016 oil and gas lease sale in the

Vernal Field Office in Utah (July 15, 2016); a protest of BLM's planned September 20, 2016 oil and gas lease sale in the Bienville and Homochitto National Forests in Mississippi (July 20, 2016); protest of the BLM's planned October 18, 2016 oil and gas lease sale in the Glasgow, Havre, Malta, and Miles City Field Offices in Montana (August 18, 2016); comments on the February 2017 lease sale for the Wind River/Bighorn Basin District in Wyoming (August 24, 2016); comments on the proposed April 19, 2017 oil and gas lease sale in the Oklahoma Field Office (August 29, 2016); comments regarding the BLM's January 2017 oil and gas lease sale in the Farmington Field Office in New Mexico (September 2, 2016). This list is not exhaustive, but demonstrates the Sierra Club's active engagement and interest in BLM oil and gas lease sales.

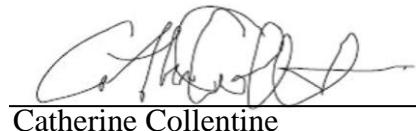
10. Sierra Club and its members have participated in public comment periods, citizen tribunals/testimony, lobby meetings, petitions, and events opposing federal leasing and oil and gas development in offshore waters. For example, in 2016, I organized a fly-in to persuade Interior to remove the Gulf of Mexico lease sales from the 2016–2022 5-year plan with hundreds of people from across the country converging in DC against the ongoing offshore leases. Additionally, Sierra Club is one of several organizations who have filed litigation against BOEM for holding lease sales in the Gulf of Mexico without conducting proper environmental analysis of the impacts under NEPA.

11. If the temporary pause on oil and gas leasing on federal lands is struck down, it could have the effect of continuing or increasing leasing on federal lands and waters without the planned environmental review. This would harm Sierra Club members who use and enjoy those lands and waters for purposes that are incompatible with oil and gas development, such as hiking, fishing, camping, bird watching, and enjoying their natural beauty.

12. Finally, I am also a member of the Sierra Club. I personally recreate (skiing, hiking, backpacking, camping) on the Medicine Bow-Routt National Forest (WY), White River NF (CO), and Bridger-Teton NF (WY), and I plan to recreate there in the future. Permitting oil and gas exploration, leasing, and development in these areas can have adverse environmental impacts as described above, while a pause on future leasing and other operations pending an environmental review would protect these areas and my use and enjoyment of them.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 23rd day of April, 2021.



Catherine Collentine